

OPEN MEETING AGENDA ITEM



0000158553

BEFORE THE ARIZONA CORPORATION COMMISSION

**COMMISSIONERS**

BOB STUMP - Chairman  
GARY PIERCE  
BRENDA BURNS  
BOB BURNS  
SUSAN BITTER SMITH

Arizona Corporation Commission

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**ORIGINAL**

IN THE MATTER OF THE JOINT APPLICATION  
OF UNS ELECTRIC, INC. AND UNS GAS, INC.  
FOR A FINANCING ORDER AUTHORIZING  
VARIOUS FINANCING TRANSACTIONS.

DOCKET NO. E-04204A-13-0447  
G-04204A-13-0447

**STAFF'S COMMENTS ON THE  
RECOMMENDED OPINION AND  
ORDER**

Staff of the Arizona Corporation Commission ("Staff") hereby submits its comments and request for clarification of the Recommended Opinion and Order ("ROO"). Staff thanks the Administrative Law Judge ("ALJ") for her thorough and well-reasoned ROO. Below are two small but important clarifications that Staff seeks to the ROO.

The ROO does not appear to address in the ordering paragraphs condition (8) which was contained in Staff's September 16, 2014 Staff Report at page 9. The Staff Report provided that: "The Commission cancel all previously authorized but unused borrowing authority." Except as it related to previously authorized but unused borrowing authority under the revolver agreement, the parties subsequently agreed to this point.<sup>1</sup> Thus, Staff requests clarification of this point in the ROO and its ordering paragraphs.

Staff agrees with the essence of the Company's comments filed on December 4, 2014 and requests clarification of the ROO in three places to reflect the Companies' concerns. First, on page 4, the heading "The Companies' Short-Term Debt Request" should be changed to "The Companies' Credit Agreement Request." On page 13 of the ROO at line 8, "current" ICR should be changed to "pro forma" ICR in two places.

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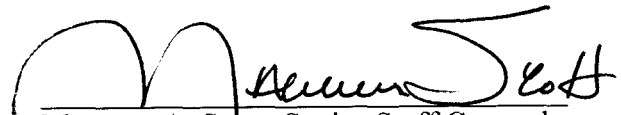
<sup>1</sup> See ROO at page 18, para. 62, subpara. 20 at lines 4-7.

1 On page 14 of the ROO, condition (8) should be modified to include the word "authorized" as  
2 follows: "Cancel all previously *authorized* but unused borrowing authority."

3 Finally, on page 5 at line 24, delete "Back" and insert "Black."

4 With these minor changes, Staff believes that these issues will be resolved and appreciates the  
5 ALJ's consideration of these modifications to the ROO.

6 RESPECTFULLY SUBMITTED this 8<sup>th</sup> day of December 2014.

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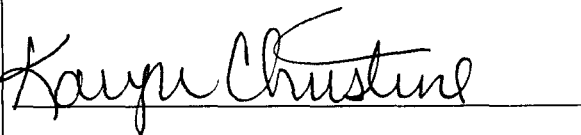
15 Original and thirteen (13) copies  
16 of the foregoing filed this 8<sup>th</sup>  
day of December 2014 with:

17 Docket Control  
18 Arizona Corporation Commission  
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